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November 20th, 2006

Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Reply Comments
ET Docket No. 06-135 & RM-11271

Dear Chairman Martin:

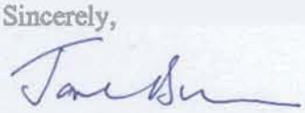
As Senior Lecturer and Principal Investigator at the University of Southampton, I support the Alfred Mann Foundation's ("AMF") request that the Commission adopt service rules and allocate up to 20 MHz of spectrum to accommodate new wireless wideband microstimulator devices on a secondary basis. The University of Southampton, through a project that I led, conducted the first clinical trial in which AMF microstimulators have been used to control functional arm and hand movement in post-stroke patients. This work has resulted in significant recovery of function among this group of patients, and we propose to continue our research using the new wireless microstimulators. We anticipate that the new generation of devices will be not only more effective, but also considerably more convenient for patients to use. If our work continues to show significant benefits, the scope for the equipment's application to many other conditions and to large numbers of patients is considerable, and has the potential for an enormous impact on the quality of life of disabled people.

The establishment of a service allocation is vital to the development of a new generation of wireless wideband medical devices designed to restore sensation and function to paralyzed limbs and organs. These devices offer a safer, less invasive, and more effective treatment option than is available with existing equipment.

The Commission's rules currently do not provide any spectrum to permit operation of new wireless wideband microstimulator devices. Although the Commission has allocated some spectrum for medical telemetry operations and for medical implant communications services, this spectrum is not suitable for wideband medical implant devices that require larger bandwidths to perform more complex functions. Without adequate spectrum and service rules to support the operation of these innovative devices, many people will be deprived of a safe and effective medical treatment for their debilitating health conditions.

The Commission's notice of inquiry issued in the above-referenced proceeding is an important first step toward adopting the necessary rules to encourage deployment of the next generation of wireless wideband microstimulator devices. Dr Burridge urges the Commission to continue its efforts in this area by expeditiously granting AMF's request for commencement of a separate rulemaking.

Sincerely,



Dr Jane Burridge
Senior Lecturer and Principal Investigator
University of Southampton

cc: Marlene H. Dortch
FCC Secretary